



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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N62661.AR 001921
NAVSTA NEWPORT RI
5090 3a

May 16, 2005

Curtis Frye
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Navy's Responses to EPA Comments on the Draft February 22, 2005 Teleconference
Minutes: Excavation Constructability Review for the Old Fire Fighting Training Area at
Naval Station Newport

Dear Mr. Frye:

EPA reviewed the Navy's responses, dated April 22, 2005 to EPA's comments, dated March 7, 2005 on the draft minutes for the February 22, 2005 teleconference to discuss the *OFFTA Excavation Constructability Review* for soil removal at the Old Fire Fighting Training Area, Naval Station Newport, Newport, RI. Detailed comments are provided in Attachment A.

It is my understanding that our mutual general agreement was that the Navy would excavate as deep as is practical, without the use of sheet piles, in areas of the Site where organic contaminants of concern exceed the cleanup goals. This includes excavation beneath the water table elevation to the extent that this is effective in removing contaminants of concern and does not endanger the health and safety of Site workers or equipment. There is no artificial three foot limit to the expected excavation depth. Also, clean soil will be removed and temporarily stockpiled if it will facilitate the removal of contaminants of concern from deeper excavations. In addition, the Navy has committed to remove subgrade concrete structures and to investigate such structures for and remove non-aqueous phase liquids (NAPLs) or other contaminants that could potentially migrate from such structures during removal operations.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA

ATTACHMENT A

1. p. 1: Accepted.
2. p. 1, Last : Pursuant to understanding of our mutual general agreement
3. p. 2, 8: EPA accepts that target excavation depths will be presented in the Removal Action Work Plan.
4. p. 3, 8: EPA did not understand that RIDEM agreed to accept a PetroFlag screening threshold of 500 ppm for wet soil samples and would like RIDEM to clarify their position regarding the use of PetroFlag screening for the record.
5. p. 4, 3: Please refer to the comment on General Comment #1.
6. p. 4, bullet 4: Accepted.
7. p. 5, 2nd last : EPA expects that a detailed revetment design will be presented in the Removal Action Work Plan, as the Navy indicated in their responses to EPA's comments of February 22, 2005 on the constructability documents.